


ORIGINAL


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(216) 861-4533
(216) 861-4568 (fax)

*Attorneys for Defendants Cleveland-Cliffs Inc and
The Cleveland-Cliffs Steamship Company*

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN STEAMSHIP OWNERS
MUTUAL PROTECTION AND
INDEMNITY ASSOCIATION, INC.

Plaintiff,

v.

ALOCA STEAMSHIP CO., INC.
and the Other Entities Listed on Exhibit A
hereto,

Defendants.

CASE NO. 04 CV 04309 (LAK)

**NOTICE OF MOTION
FOR ADMISSION PRO HAC VICE**

FILED
U.S. DISTRICT COURT
2004 OCT -9 PM 3:34
S.D. OF N.Y.

TO:
Lawrence J. Bowles, Esq.
Nourse & Bowles, LLP
One Exchange Plaza at 55 Broadway
New York, NY 1006-3030

and

All Counsel of Record

and

All Unrepresented Defendants

PLEASE TAKE NOTICE that upon the Declaration of Dale A. Schreiber, executed on October 6, 2004, the affidavits of Gene B. George and Julia R. Brouhard sworn to on October 6, 2004, defendants Cleveland-Cliffs Inc, erroneously named as successor to Cleveland-Cliffs Steamship Company, and The Cleveland-Cliffs Steamship Company will move this court, located at 500 Pearl Street, Daniel Patrick Moynihan United States Courthouse, New York, NY 10007, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of Gene B. George, Esq., a partner in the firm of Ray, Robinson, Carle & Davies, P.L.L. and a member in good standing of the Bar of the State of Ohio and Julia R. Brouhard, Esq. a partner in the firm of Ray, Robinson, Carle & Davies, P.L.L. and a member in good standing of the Bar of the State of Ohio, as attorneys *pro hac vice* to argue or try, if necessary, this case in whole or in part as counsel. There are no pending disciplinary proceedings against Mr. Gene B. George or Mrs. Julia R. Brouhard.

Dated: October 6, 2004

PROSKAUER ROSE LLP

By: Dale A. Schreiber
Dale A. Schreiber (DS-9211)
1585 Broadway
New York, NY 10036-8299
(212) 969-3000

-and-

RAY, ROBINSON, CARLE & DAVIES,
P.L.L.
Gene B. George, Esq.

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 Cleveland, Ohio 44114-2898
 (216) 861-4533

*Attorneys for Defendants Cleveland-Cliffs Inc and
 The Cleveland-Cliffs Steamship Company*

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

	X	
	:	CASE NO. 04 CV 04309 (LAK)
AMERICAN STEAMSHIP OWNERS	:	
MUTUAL PROTECTION AND	:	
INDEMNITY ASSOCIATION, INC.	:	
	:	AFFIRMATION OF
Plaintiff,	:	DALE A. SCHREIBER
v.	:	IN SUPPORT OF APPLICATION
	:	FOR ADMISSION OF COUNSEL
ALOCA STEAMSHIP CO., INC.	:	PRO HAC VICE
and the Other Entities Listed on Exhibit A	:	
hereto,	:	
	:	
Defendants.	:	
	X	

Dale A. Schreiber, being duly sworn according to law, deposes and says:

1. I am an attorney-at-law of the State of New York and a member of the firm of Proskauer Rose LLP, 1585 Broadway, New York, NY 10036-8299, attorneys for defendants Cleveland-Cliffs Inc, erroneously named as successor to Cleveland-Cliffs Steamship Company, and The Cleveland-Cliffs Steamship Company.

2. I make this Affidavit in support of the application of Gene B. George, Esq. and Julia R. Brouhard, Esq. for admission to the bar of this Court *pro hac vice*.

3. Original Affidavits from Mr. Gene B. George and Mrs. Julia R. Brouhard in support of their application for admission to the bar of this Court *pro hac vice* have also been filed in support of this Application.

4. I will be associated with Mr. Gene B. George and Mrs. Julia R. Brouhard in the defense of this matter, and I or another member or associate of Proskauer Rose, LLP, will file papers, enter appearances, and sign all pleadings, briefs and other papers to be filed with the Court as required by the Rules of this Court.

Dated: New York, New York
October 6, 2004

PROSKAUER ROSE LLP

By: Dale A. Schreiber
Dale A. Schreiber (DS-9211)
1585 Broadway
New York, New York 10036-8229
(212) 969-3000

PROSKAUER ROSE LLP
 Dale A. Schreiber (DS-9211)
 Colin A. Underwood (CU-3445)
 Seth B. Schafler (SS-5993)
 1585 Broadway
 New York, NY 10036-8299
 (212) 969-3000

RAY, ROBINSON, CARLE & DAVIES P.L.L.
 Julia R. Brouhard, Esq.
 Gene B. George, Esq.
 1717 East 9th Street, Ste. 1650
 Cleveland, Ohio 44114-2898
 (216) 861-4533

*Attorneys for Defendants Cleveland-Cliffs Inc and
 The Cleveland-Cliffs Steamship Company*

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

	X	
AMERICAN STEAMSHIP OWNERS	:	CASE NO. 04 CV 04309 (LAK)
MUTUAL PROTECTION AND	:	
INDEMNITY ASSOCIATION, INC.	:	VERIFIED MOTION OF JULIA
	:	R. BROUHARD FOR ADMISSION
	:	PRO HAC VICE
Plaintiff,	:	
v.	:	
ALOCA STEAMSHIP CO., INC.	:	
and the Other Entities Listed on Exhibit A	:	
hereto,	:	
Defendants.	:	
	X	

Pursuant to the local rules of the United States District Court for the Southern District of New York, I, Julia R. Brouhard, move to be admitted pro hac vice to the bar of this Court for the purpose of representing Cleveland-Cliffs Inc, erroneously named as successor to Cleveland-Cliffs Steamship Company, and The Cleveland-Cliffs Steamship Company, at their specific request, in this matter. In support of this motion, I submit the following information:

(a) My full name is Julia R. Brouhard;

- (b) My office address is 1717 E. 9th Street, Suite 1650, Cleveland, Ohio 44114, telephone number (216) 861-4533, fax number (216) 861-4568, e-mail jbrouhard@rayrobele.com;
- (c) I am a partner with the law firm of Ray, Robinson, Carle & Davies P.L.L.;
- (d) I graduated from the University of Houston law school on May 16, 1981;
- (e) I am admitted to practice by the Bars of the following state and federal courts:

Supreme Court of Texas – May 15, 1981 – No. 03087200
(currently inactive status)

Supreme Court of Ohio – September 19, 1989 – No. 0041811

U.S. District Court for the Northern District of Ohio – July 12, 1989

U.S. District Court for the Eastern District of Michigan –
October 25, 1989

Trial Bar of the U.S. District Court for the Northern District of
Illinois – July 16, 1992 – No. 90784309

U.S. District Court for the Western District of Pennsylvania –
September 9, 1999

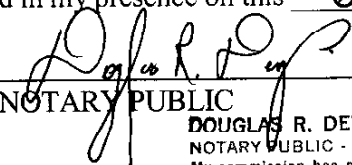
- (f) I am a member in good standing of all Bars listed above (inactive status in Texas) and I am not under investigation, suspension or disbarment from any Bar (see attached Ohio Certificate of Good Standing);
- (g) I understand that I am charged with knowing and complying with the Rules of this Court, including disciplinary rules.
- (h) I agree to pay \$25.00 upon approval by this court.

Movant attests under penalty of perjury the truth and accuracy of the foregoing facts, and respectfully requests that this motion to be granted and that the movant be admitted pro hac vice to the bar of the court to appear in the instant matter.


JULIA R. BROUHARD

Dated: October 6th, 2004

Sworn to before me and subscribed in my presence on this 6th day of
October, 2004.


NOTARY PUBLIC
DOUGLAS R. DENNY, Attorney
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date.
Section 147.03 R.C.

The Supreme Court of Ohio

C E R T I F I C A T E

I, RICHARD A. DOVE, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Attorney Registration Section of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Julia Ranney Brouhard

was admitted to the practice of law in Ohio on September 19, 1989; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 30th day of September, 2004.

RICHARD A. DOVE

Director, Attorney Services Division



Attorney Services Counsel

PROSKAUER ROSE LLP
 Dale A. Schreiber (DS-9211)
 Colin A. Underwood (CU-3445)
 Seth B. Schafler (SS-5993)
 1585 Broadway
 New York, NY 10036-8299
 (212) 969-3000

RAY, ROBINSON, CARLE & DAVIES P.L.L.
 Gene B. George, Esq.
 Julia R. Brouhard, Esq.
 1717 East 9th Street, Ste. 1650
 Cleveland, Ohio 44114-2898
 (216) 861-4533

*Attorneys for Defendants Cleveland-Cliffs Inc and
 The Cleveland-Cliffs Steamship Company*

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

	X	
	:	CASE NO. 04 CV 04309 (LAK)
AMERICAN STEAMSHIP OWNERS	:	
MUTUAL PROTECTION AND	:	VERIFIED MOTION OF GENE
INDEMNITY ASSOCIATION, INC.	:	B. GEORGE FOR ADMISSION
	:	PRO HAC VICE
Plaintiff,	:	
v.	:	
	:	
ALOCA STEAMSHIP CO., INC.	:	
and the Other Entities Listed on Exhibit A	:	
hereto,	:	
	:	
Defendants.	:	
	X	

Pursuant to the local rules of the United States District Court for the Southern District of New York, I, Gene B. George, move to be admitted pro hac vice to the bar of this Court for the purpose of representing Cleveland-Cliffs Inc, erroneously named as successor to Cleveland-Cliffs Steamship Company, and The Cleveland-Cliffs Steamship Company, at their specific request, in this matter. In support of this motion, I submit the following information:

(a) My full name is Gene B. George;

- (b) My office address is 1717 E. 9th Street, Suite 1650, Cleveland, Ohio 44114, telephone number (216) 861-4533, fax number (216) 861-4568, e-mail ggeorge@rayrobcle.com;
- (c) I am a partner with the law firm of Ray, Robinson, Carle & Davies P.L.L.;
- (d) I graduated from the University of Michigan law school on December 22, 1973;
- (e) I am admitted to practice by the Bars of the following state and federal courts:
 - Supreme Court of Ohio – April 27, 1974 – No. 0001366
 - U.S. District Court for the Northern District of Ohio – 1974
 - Sixth Circuit Court of Appeals – 1976
- (f) I am a member in good standing of all Bars listed above and I am not under investigation, suspension or disbarment from any Bar (see attached the Ohio Certificate of Good Standing);
- (g) I understand that I am charged with knowing and complying with the Rules of this Court, including disciplinary rules.
- (h) I agree to pay \$25.00 upon approval by this court.

Movant attests under penalty of perjury the truth and accuracy of the foregoing facts, and respectfully requests that this motion to be granted and that the movant be admitted pro hac vice to the bar of the court to appear in the instant matter.

Gene B. George
GENE B. GEORGE

Dated: October 6, 2004

Sworn to before me and subscribed in my presence on this 6TH day of

October, 2004.

Douglas R. Denny
NOTARY PUBLIC
DOUGLAS R. DENNY, Attorney
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date.
Section 147.03 R.C.

The Supreme Court of Ohio

C E R T I F I C A T E

I, RICHARD A. DOVE, Director of the Attorney Services Division of the Supreme Court of Ohio, do hereby certify that I am the custodian of the records of the Attorney Registration Section of the Supreme Court and that the Attorney Services Division is responsible for reviewing Court records to determine the status of Ohio attorneys. I further certify that, having fulfilled all of the requirements for admission to the practice of law in Ohio,

Gene Bruce George

was admitted to the practice of law in Ohio on April 27, 1974; has registered as an active attorney pursuant to the Supreme Court Rules for the Government of the Bar of Ohio; is in good standing with the Supreme Court of Ohio; and is entitled to practice law in this state.

IN TESTIMONY WHEREOF, I have subscribed my name and affixed the seal of the Supreme Court, this 30th day of September, 2004.

RICHARD A. DOVE
Director, Attorney Services Division

Susan B. Christy
Attorney Services Counsel

PROSKAUER ROSE LLP
 Dale A. Schreiber (DS-9211)
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 Cleveland, Ohio 44114-2898
 (216) 861-4533

*Attorneys for Defendants Cleveland-Cliffs Inc and
 The Cleveland-Cliffs Steamship Company*

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

	X	
AMERICAN STEAMSHIP OWNERS	:	CASE NO. 04 CV 04309 (LAK)
MUTUAL PROTECTION AND	:	
INDEMNITY ASSOCIATION, INC.	:	PROPOSED ORDER ALLOWING
	:	APPEARANCE OF COUNSEL
	:	PRO HAC VICE
Plaintiff,	:	
v.	:	
	:	
ALOCA STEAMSHIP CO., INC.	:	
and the Other Entities Listed on Exhibit A	:	
hereto,	:	
	:	
Defendants.	:	
	X	

Upon the motion of defendants Cleveland-Cliffs Inc and The Cleveland-Cliffs Steamship Company that Gene B. George and Julia R. Brouhard be permitted to appear in this case on their behalf in the above-captioned action, it is hereby

ORDERED:

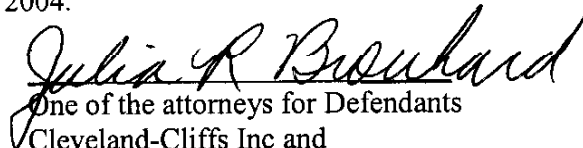
That Gene B. George and Julia R. Brouhard may argue and try this matter on behalf of
defendants The Cleveland-Cliffs Inc and The Cleveland-Cliffs Steamship Company.

Dated:

JUDGE:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Verified Motion of Julia R. Brouhard for Admission Pro Hac Vice, Verified Motion of Gene B. George for Admission Pro Hac Vice, Affirmation of Dale A. Schreiber in Support of Application for Admission of Counsel Pro Hac Vice, Notice of Motion for Admission Pro Hac Vice and Proposed Order Allowing Appearance of Counsel Pro Hac Vice has been served on all counsel of record by means of the Court's electronic filing system and on all other parties or their counsel shown on the attached Service List by first class mail, postage prepaid, this 8th day of October, 2004.


One of the attorneys for Defendants
Cleveland-Cliffs Inc and
The Cleveland Cliffs Steamship Company

SERVICE LIST

Academy Tankers Inc.
c/o Secretary of State
Townsend Building
Dover, DE 19901

Canterbury Shipping Corp.
c/o Secretary of State
Townsend Building
Dover, DE 19901

National Oil Transport Co.
c/o Secretary of State
Townsend Building
Dover, DE 19901

Alcoa Steamship Co., Inc.,
as Successor to Lib-Ore Steamship, Inc.,
Pan-Ore Transportation, Inc. and
Reynolds Metals Company
201 Isabella Street
Pittsburgh, PA 15212

Barry L. Doney, VP
American Atlantic Co.
as Successor to American Dredging Company
900 East Eighth Avenue, Suite 300
King of Prussia, PA 19406

American Maritime Holdings Inc.
39 Broadway
New York, NY 10006

American Steamship Company
500 Essjay Road
Williamsville, NY 14221

Robert Gruendel
Counsel for Apex Oil, Crest Tankers Inc.,
Mathiasen's Tanker Industry Inc. and
Trinidad Corporation
Curtis, Mallet-Prevost Cait & Masle
101 Park Avenue
New York, New York 10178-0061

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Counsel for APL, Ltd. as Successor to
American Mail Line and American President
Lines, Inc.
Holland & Knight
195 Broadway, 24th Floor
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Atlantic Richfield Company
515 South Flower Street
P.O. Box 2679
Los Angeles, CA 90071

Argosy Offshore Ltd.
1010 Milam
Houston, TX 77002

Caribbean Steamship Co. S.A.
P.O. Box 2568
Corpus Christi, TX 78403

Avon Steamship Co. Inc.
Agents for Amherst Shipping Inc.
410 Lakeville Road, Rm. 201
Lake Success, NY 11040

Barber Asphalt Corp.
c/o CT Corporation System
277 Park Avenue
New York, NY 10017

Barge Transport Company
P.O. Box 2569
1812 Durham Drive
Houston, TX 77252-2569

Bermuda Atlantic Line Ltd.
760 N.E. 7th Avenue
Dania, FL 33004

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as Successor to Grosvenor-Dale Co., Inc.
Chadbourne & Parke LLP
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as Successor to California Oil Company
Cummings & Lockwood LLC
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Stamford, CT 06904-0120

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30 Skyline Drive
Lake Mary, FL 32795

Coastal Carriers Inc.
c/o Clayton Ragas
216 Ft. Jackson Street
Belle Chasse, LA 70037

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Trustee in Bankruptcy for
Compania de Navegacao Maritima Netumar
d/b/a Netumar Lines
Becker Meisel LLC
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345 Eisenhower Parkway, Suite 2800
Livingston, NJ 07039

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Pleasanton, CA 94566

Dillingham Construction Corporation
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P.O. Box 1089
Pleasanton, CA 94566

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Edward A. Keane
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and Union Carbide Corporation
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Weston, CT 06883

Loveland Holding Company, Inc.
f/k/a S.C. Loveland Co., Inc.
P.O. Box 368
Supawna Road
Pennsville, NJ 08070

Carolyn S. Schwartz
Office of U.S. Trustee of
Enron Corporation
33 Whitehall Street, 21st Floor
New York, NY 10004

Equistar Chemicals, LP
as Successor to Cuba Distilling Company
and National Distilling Products Corp.
300 Doremus Avenue
Newark, NJ 07105

Euro Gulf International
c/o Diamond State Corp. Agents Inc.
1200 North Broom Street
Wilmington, DE 19806

Federal Transport Company, Inc.
c/o Del Monte Fresh Produce Company
P.O. Box 149222
Coral Gables, GL 33114

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New York, New York 10017

Lee J. DiCola
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c/o PLI Disbursement Trustee
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c/o Gil Anthony Hebert
437 Menard Road
Houma, LA 70360

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Grand Rapids, Michigan 49503-2487

Camilo Cardozo
Counsel for Ispat Inland Inc.
Piper Rudnick
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New York, NY 10020

Kirby Inland Marine, Inc.
as Successor to Hollywood Marine, Inc.

55 Waugh Drive, Suite 1000
Houston, TX 77007

Lafarge North America Inc.
as Successor to Huron Transportation, Inc.
12950 Worldgate Drive, Suite 600
Herndon, Virginia 20170

Mu-Petco Shipping Co. Inc.
c/o The Corporation Trust Co.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

New Jersey Barging Corp. (Del.)
c/o The Corporation Trust Co.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

National Gypsum Co.
2001 Rexford Rd.
Charlotte, NC 28211
Ormet Corporation
1233 Main Street, Suite 4000
Wheeling, WV 26003

Nicor Inc., as Successor to
National Marine Service Inc. and
Lake Tankers Corporation
1209 Orange Street
Wilmington, DE 19801

Offshore Express Inc.
438 Menard Road
P.O. Box 2666
Houma, LA 70361

Oglebay Norton, as Successor to
Columbia Steamship Company Inc.
North Point Tower
1001 Lakeside Ave., 15th Floor
Cleveland, OH 44114

Robert A. O'Hare, Jr.
Counsel for Central Gulf Lines as
Successor to Central Gulf Lighters/
Waterman Steamship Corporation
O'Hare Parnagian LLP
82 Wall Street, Suite 300

New York, NY 10005-3686

Lee J. DiCola
Prudential Lines, Inc.
c/o PLI Disbursement Trustee
2800 Carrington Street NW
North Canton, OH 44709

Puerto Rico Maritime Shipping Authority
Building No. 123
Fleet and Bombay Streets
Elizabeth, NJ 07208

Resolve Maritime Corporation
c/o Charles Lea Hume
25 W. Flagler Street
5th Floor, City National Bank Building
Miami, FL 33130

Sabine Towing & Transportation Co., Inc.
7200 Highway 87 East
Port Arthur, TX 77642

Sea Mobility Inc.
c/o US Corporation Company
2711 Centerville Road, Suite 400
Wilmington, DE 19808

World Wide Tankers Inc.
c/o US Corporation Company
2711 Centerville Road, Suite 400
Wilmington, DE 19808

Seaport Harbor Cruise Lines
17 Battery Place
New York, NY 10004

SEI II Equipment Inc.
f/k/a Shearson Equipment Management
745 7th Avenue
New York, NY 10019

Weeks Marine Inc.
as Successor to American Dredging Company
4 Commerce Drive
Cranford, NJ 07016

Texas City Refining Inc.
P.O. Box 1271
Texas City, TX 77592-1271

Tropigas Inc.
2151 LeJune Road
Coral Gables, FL 33134

Unites States Maritime Administration
US DOT
400 7th Street, SW
Washington, DC 20590

Verizon Communications
as Successor to New York Telephone
1095 Avenue of the Americas
New York, NY 10036

West India Shipping Co., Inc.
Agents for West India Industries, Inc.
18th Floor, Great Southwest Building
1314 Texas Street
Houston, TX 77002

Arema C.I.F.S.A.
Viamonte 494
9 Piso
1053 Buenos Aires, Argentina

Arpez S.A.
Calle Venezuela 110
1095 Bucnos Aires, Argentina

Atlantic Richfield Indonesia Inc.
Landmark Center Tower B
Jl. Jenderal Sudirman Kav. 70A
P.O. Box 1063
12910 Jakarta Java, Indonesia

Astra Compania Argentina de Petroleo S.A.
Tucuman 744, 11th Floor
1049 Buenos Aires, Argentina

Avila y Pizarro Compania Ltda.
Agents for Van Gogh Inversiones SA
Blanco 570
Valparaiso, Chile

Trade & Transport Inc.
61-65, Filonos Street
P.O. Box 104
Piraeus, Greece

Empresa de Navegacion El Faro
Calle Lavalle 388
1047 Buenos Aires, Argentina

Marifran International S.A.
Calle Paraguay 577
4 Piso
Buenos Aires, Argentina

Marifran International S.A.
Avenida 25 de Mayo 401
1002 Buenos Aires, Argentina

Nedbarges Sublift BV
Westmolenstraat 1
Lange Haven, 3111 BS Schiedam
Netherlands

Oscar Transportation Group
97, Akti Miaouli
185 38 Piraeus, Greece

Tecomar S.A.
Avenida 39 Ote. No. 1204A
Col Anzures
Puebla, 72530 Mexico

Mindy G. Davis
Christine Davis
Counsel for Amerada Hess as
Successor to Hess Oil and Chemical Corp.
Howrey Simon Arnold & White LLP
1299 Pennsylvania Avenue, NW
Washington, DC 20004-2402

Tom E. Tetlak, Esq., Senior Attorney
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(as Successor to American Oil Company/Standard Oil
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Ohio Alaskan Petroleum Co./
SPC Shipping Inc.)
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Warrenville, IL 60555